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October 14, 2020

VIA ECF

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: **Kassman, et al. v. KPMG LLP, Case No. 11-cv-03743 (LGS)**

Dear Judge Schofield:

In accordance with the Court's October 1, 2020 Order (Dkt. 942), the Parties have filed a Proposed Order dismissing certain former opt-in plaintiffs who have submitted Verified Fact Sheets and have stipulated to the dismissal of their claims. (Dkt. 943). Pursuant to Rule I.D.3 of this Court's Individual Rules and Procedures for Civil Cases and Section 10(a) of the Stipulated Protective Order, Defendant KPMG LLP ("KPMG") respectfully submits this letter motion proposing that certain limited and discrete information in Exhibit A to the Proposed Order be redacted and sealed. In accordance with Rule I.D.3, KPMG has publicly filed the Exhibit with the proposed redactions and has electronically filed under seal a copy of the unredacted Exhibit with the proposed redactions highlighted.

The proposed redactions in question are carefully and narrowly limited to text disclosing employee personnel and personal information, specifically, the employee identification number (EEID) of the former opt-in plaintiffs. Individuals utilize their EEIDs to access certain personnel systems that contain additional personnel and personal information and disclosing them publicly could put this sensitive information at risk. *See also Murphy v. Rochester City Sch. Dist.*, 2002 WL 31322639, at *1-4 (W.D.N.Y. Sept. 30, 2002) (sealing employee personnel information). KPMG thus respectfully requests that the Court order that the EEIDs of each of the individuals listed in Exhibit A be publicly docketed only with KPMG's redactions, and unredacted versions be filed under seal, to be accessed by all attorneys of record, as noted in the attached appendix.

Very truly yours,

/s/ Colleen M. Kenney

Colleen M. Kenney

CC: All Counsel of Record, via ECF



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APPENDIX

Pursuant to Individual Rule I.D.3, KPMG identifies below all parties and attorneys of record who should have access to the sealed document:

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